

LAW OFFICE OF KEN SCHNEIDER, PS
2015 33rd Street.
Everett, WA 98201
(425) 258-2704

The Honorable Christopher M. Alston
United States Bankruptcy Judge

Date: October 4, 2019
Time: 9:30 a.m.

Location: U.S. Bankruptcy Court
700 Stewart Street Rm 7206
Seattle, WA 98101

Response Deadline: September 27, 2019

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

STACIE ESTAY

Debtors.

) IN PROCEEDINGS UNDER CHAPTER 7
)
) NO. 19-12349
)
) MOTION TO AVOID LIEN OF
) OF CREDIT INTERNATIONAL
) CORPORATION
) AND NOTICE THEREOF
)

NOTICE

Please take notice that the undersigned will bring on for a hearing a Motion to Avoid Lien of Credit International Corporation before the Honorable Christopher M. Alston, United States Bankruptcy Judge, on the date above noted, in said Judge's assigned courtroom, U.S. Bankruptcy Court, 700 Stewart Street, Seattle, Washington, 98101, or at such other time and place as the Clerk of the Court may direct. Anyone opposing the relief requested above must file written objection with the Clerk of the Court no later than seven (7) days prior to the hearing. If no response is filed within the time allowed, the court may in its discretion grant the motion prior to the hearing, without further notice.

MOTION TO AVOID LIEN - 1

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MOTION

1. Debtor's employer, Regus Management Group, LLC, (garnishee), was served with a writ of garnishment by creditor Credit International Corporation, (Judgment Creditor) in Snohomish County Superior Court case number 13-2-07327-5
2. The registered agent for the Judgment Creditor, is Larry A. Johnstone, 144 Railroad Avenue Ste. 203, Edmonds, WA 98020 and its principal office is located at 10413 Beardslee Blvd Ste. A, Bothell, Washington 98011. Exhibit A.
3. Snohomish County Superior Court is holding \$784.74 pursuant to a writ of garnishment issued by the judgment creditor. The garnished funds were disclosed and claimed as exempt in the debtor's schedules.
4. Judgment Creditor has a judicial lien on these funds.
5. 11 U.S.C. §522 (f) permits the debtor to avoid a lien to the extent that it impairs an exemption to which the debtor would have been entitled.
6. The entire amount held by Snohomish County Superior Court would have been exempt if paid over to the debtor and the entire amount is impaired by the lien.

WHEREFORE the debtor moves the court for:

1. An order avoiding the lien of judgment creditor and directing the Snohomish County Superior Court to pay over, to the debtor's attorney, all funds held pursuant to the writ of garnishment.
2. For such other relief as the court shall order.

DATED: August 26, 2019

/s/ Ken Schneider
Ken Schneider, WSBA #22410
Attorney for Debtor

MOTION TO AVOID LIEN - 2

LAW OFFICE OF KEN SCHNEIDER, PS
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EVERETT, WA 98201 (425) 258-2704

BUSINESS INFORMATION

Business Name:

CREDIT INTERNATIONAL CORPORATION

UBI Number:

601 048 069

Business Type:

WA PROFIT CORPORATION

Business Status:

ACTIVE

Principal Office Street Address:

10413 BEARDSLEE BLVD STE A, BOTHELL, WA, 98011-3463, UNITED STATES

Principal Office Mailing Address:

10413 BEARDSLEE BLVD STE A, BOTHELL, WA, 98011-3463, UNITED STATES

Expiration Date:

09/30/2020

Jurisdiction:

UNITED STATES, WASHINGTON

Formation/ Registration Date:

09/29/1987

Period of Duration:

PERPETUAL

Inactive Date:

Nature of Business:

OTHER SERVICES

REGISTERED AGENT INFORMATION

Registered Agent Name:

LARRY A. JOHNSTONE, ATTY AT LAW, PLLC

Street Address:

144 RAILROAD AVE STE 203, EDMONDS, WA, 98020-4121, UNITED STATES

Mailing Address:

144 RAILROAD AVE STE 203, EDMONDS, WA, 98020-4121, UNITED STATES

GOVERNORS

Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		ROBERT	BAKKER
GOVERNOR	INDIVIDUAL		SUSAN	MUNROE
GOVERNOR	INDIVIDUAL		ALEX	GALLEGOR